

1 NICHOLAS A. TRUTANICH
United States Attorney
2 Nevada Bar No. 13644
DANIEL D. HOLLINGSWORTH
3 Assistant United States Attorney
Nevada Bar No. 1925
4 501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
5 Telephone: 702-388-6336
Email: Daniel.Hollingsworth@usdoj.gov
6 Attorneys for the United States of America

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9 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA ,
11
12 Plaintiff,
13 v.
14 CHARLES BURTON RITCHIE and
BENJAMIN GALECKI,
15 Defendants.

2:15-CR-285-APG-PAL

**Government's Unopposed Motion To
Extend the Time to Respond to Motion for
Release of Funds for Purposes of Paying
Civil Settlement (ECF No. 249)**

(Third Request)

16 The United States of America respectfully moves this Court for an Order extending
17 the time for the government to respond to defendants' Motion for Release of Funds for
18 Purposes of Paying Civil Settlement (ECF No. 249). The original deadline for responding to
19 the Motion was January 3, 2019. In the first request, the government requested an extension
20 of time to and including January 17, 2019, that this Court granted (ECF Nos. 250, 251). The
21 government requested a second extension of time to and including February 15, 2019, that
22 this Court granted (ECF Nos. 225 and 256). The government requests a third extension of
23 time to and including February 25, 2019.

24 The grounds for extending the time are as follows.

25 On February 8, 2019, the undersigned counsel contacted Richard Schonfeld,
26 counsel for defendants by phone who agreed to this extension of time because of the reasons
27 cited below.

28 / / /

1 The undersigned has a large and active case load. Due to the recent government
2 shutdown, undersigned was furloughed and work accumulated that must be addressed
3 immediately in other criminal cases because of upcoming sentencing hearings. Undersigned
4 has worked extremely hard and efficiently to meet all the deadlines, but he has not had time
5 to address the Response.

6 The Asset Forfeiture Unit (AFU) in the United States Attorney's Office for the
7 District of Nevada (USAO) is understaffed. AFU lacks two paralegal specialists and one full
8 time forfeiture Assistant United States Attorney (AUSA) in Las Vegas and one AUSA in
9 Reno, Nevada. The undersigned is currently the only forfeiture AUSA in the USAO. The
10 forfeiture criminal cases in Reno, Nevada, have been added to undersigned's workload.
11 Between the lack of staff, the lack of forfeiture AUSAs, the shutdown, and the criminal
12 forfeiture workload, the forfeiture work in the USAO has backed up significantly. The
13 undersigned is doing the best he can under the circumstances.

14 This Motion is not submitted solely for the purpose of delay or for any other
15 improper purpose.


16 This Court should grant an extension of time to, and including, February 25, 2019,
17 for the United States to respond to defendants' motion (ECF No. 249).

18 DATED: February 8, 2019.

19 NICHOLAS A. TRUTANICH
20 United States Attorney

21 /s/ Daniel D. Hollingsworth
22 DANIEL D. HOLLINGSWORTH
23 Assistant United States Attorney

24 IT IS SO ORDERED:

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27 HONORABLE ANDREW P. GORDON
28 UNITED STATES DISTRICT JUDGE

DATED: 2/11/2019